

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO

REGINALD ALLEN,	*	
		CASE NO. 1:01-cv-00810
Petitioner,	*	
		Judge Dlott
Vs.	*	
		Magistrate Judge Black
ALAN LAZAROFF, WARDEN,	*	
Respondent.	*	

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MOTION FOR EXTENSION OF TIME TO FILE REPLY  
TO STATE'S RESPONSE

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**COMES NOW**, Counsel for the Petitioner herein, Reginald Allen, and requests that this Court extend the time for filing the Reply to State's Response in this case fivey (5) days.

In support thereof, Counsel states the following:

1. That Counsel prepared and filed a Reply which was due May 27, 2004, in the case of U.S.A. vs Hill, U.S. District Court, Southern District of Ohio, Case No. 1:03-CR-140.
2. That Counsel prepared and filed a petition for writ of cert to the U. S. Supreme Court, in the case of David Hudson vs. Kurt Jones, 6<sup>th</sup> Cir. Case No. 02-1586.
3. That Counsel needs additional time to research and prepare this reply.
4. That Counsel has spoken with Assistant Attorney General Joseph Bodine, who indicates that he has no objection to a 5-day extension in this matter.

**WHEREFORE**, Counsel respectfully requests that this Court grant an extension of

time of 5 days, up to and including June 2, 2004.

Respectfully submitted,

s/Kevin M. Schad

Kevin M. Schad

SCHAD & COOK

*Attorney for Petitioner Allen*

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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing document has been sent this 28<sup>th</sup> day of May, 2004, by regular U.S. Mail with sufficient postage affixed thereto to ensure delivery, and addressed to:

J. Joseph Bodine, Jr.  
Assistant Attorney General  
Corrections Litigation Section  
150 East Gay Street, 16<sup>th</sup> Floor  
Columbus, Ohio 43215-6001

s/Kevin M. Schad

Kevin M. Schad

Attorney for Petitioner